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JAN 17 1992

Federal Communications Commission
Office of the Secretary

ORIGINAL

January 17, 1992

**Ms. Donna Searcy
Secretary
Federal Communications Commission
Room 222
1919 M Street NW
Washington, D.C. 20554**

**Re: National Association of Regulatory Utility Commissioners' Petition for
Notice of Inquiry Addressing Administration of the North American
Numbering Plan, Undocketed**

Dear Ms. Searcy,

**Enclosed herewith for filing are the original and four (4) copies of MCI
Communications Corporation's Reply Comments regarding the above captioned
petition, in accordance with the Commission's Public Notice dated October 18, 1991.**

**Please acknowledge receipt by affixing an appropriate notation on the copy of
the MCI Reply Comments furnished for such purpose and remit same to the bearer.**

Yours truly,

**Carol Schultz
Its Attorney**

RECEIVED

JAN 17 1992

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

Federal Communications Commission
Office of the Secretary

In the Matter of:)
)
National Association of Regulatory)
Utility Commissioners' Petition for)
Notice of Inquiry Addressing) Undocketed
Administration of the North American)
Numbering Plan)

REPLY COMMENTS

MCI Communications Corporation (MCI) hereby submits its Reply to several Comments filed in response to the Commission's Public Notice of October 18, 1991, on the National Association of Regulatory Utility Commissioners' (NARUC) petition requesting that the Commission establish a Notice of Inquiry (NOI) addressing administration of the North American Numbering Plan (NANP).¹

MCI demonstrates below that the Commission has the authority, and should immediately exercise its obligation to investigate numbering issues, particularly fair administration of NANP resources, by immediately initiating a NOI. MCI commends and

¹ Hereinafter referred to as "NARUC's Petition." Comments were filed by the following entities: Allnet Communication Services, Inc. (Allnet), The Ameritech Operating Companies (Ameritech), The American Telephone and Telegraph Company (AT&T), Bell Communications Research, Inc. (Bellcore), BellSouth Corporation (BellSouth), Rogers Cantel, Inc. (Cantel), Centel Corporation (Centel), the Public Service Commission of the District of Columbia (D.C. PSC), the Florida Public Service Commission (FPSC), GTE Service Corporation, on behalf of its domestic affiliated telephone operating companies and GTE Mobile Communications (collectively referred to herein as "GTE"), McCaw Cellular Communications, Inc. (McCaw), Metropolitan Fiber Systems, Inc. (MFS), National Telephone Cooperative Association (NTCA), NYNEX Telephone Companies (NYNEX), Pacific Telesis (Pacific), Rochester Telephone Corporation (Rochester), Southwestern Bell Telephone Company (Southwestern Bell), Telecom Canada, Teleport Communications Group (Teleport), Telocator, Unitel Communications Inc. (Unitel), United States Telephone Association (USTA), and US West Communications, Inc. (US West).

agrees with the majority of the parties who recognize the importance and urgency of Commission action in addressing numbering issues raised by NARUC, as well as additional numbering concerns.

MCI also concurs with several parties who commented that such an inquiry must be carefully structured to ensure adequate numbering resources through the timely implementation of proposed solutions. However, MCI demonstrates that previously determined price cap issues and enforcement of unofficial policies are not appropriate bases for Commission action. Thus, MCI again urges the Commission to initiate a NOI immediately to address pending concerns, structured as recommended below and in MCI's Comments on NARUC's Petition.

I. THE COMMISSION HAS THE OBLIGATION TO ASSURE EFFICIENT COMMUNICATIONS SERVICE AND THE AUTHORITY TO INVESTIGATE THE MANY NUMBERING POLICY ISSUES RAISED IN THE COMMENTS

Several parties correctly recognize in their comments the Commission's ultimate jurisdiction over numbering issues in the United States,² and its Title I authority to effectuate "a rapid, efficient, Nation-wide, and world-wide wire and radio communication service with adequate facilities at reasonable charges."³

Oddly, some carriers imply that the Commission should defer numbering decisions to Bellcore because Bellcore assumed the Bell System's historic role with respect to the NANP following divestiture pursuant to the plan of reorganization (POR),⁴ or because the

² See, e.g., AT&T at 3, Bellcore at 3, MFS at 4.

³ See, e.g., AT&T at 4, NTCA at 2.

⁴ See, e.g., Ameritech at 3, US West at 1.

Commission allegedly does not harbor as broad authority as the NANP Administrator (NANPA), specifically, authority over issues for Canada or the other nations that are a part of World Zone 1.⁵ Such assertions are incorrect. The POR only allocated the functions that were then handled by the Bell System to the entities which were separate after divestiture.⁶ Nothing in the POR purported to remove the Commission's authority over numbering.⁷

Further, the Commission, not Bellcore as the NANPA, has plenary jurisdiction over the administration of the NANP.⁸ Canada or the other NANP nations may have acquiesced or coordinated with Bellcore in some instances but they cannot confer special power over numbering on Bellcore;⁹ nor is there any evidence to indicate that these nations are less

⁵ For example, Pacific states that "the jurisdiction of the NANP is broader than the jurisdiction of the Commission. The NANP covers the United States, Canada, Bermuda, Puerto Rico, and some Caribbean nations; the Commission is responsible only for communications which originate and/or are received within the United States. Therefore, the commission's investigation into many of the issues raised by NARUC could only offer partial solutions because its jurisdiction is less than the reach of NANP, which coordinates international numbering plans. For this reason, the industry should continue to manage these issues as it has in the past." See, Pacific at 2-3.

⁶ Amendment No. 33 to the Plan of Reorganization and POR at 372-73. The MFJ approved functions of the central organization, now Bellcore, as described in the amended POR. See, United States v. Western Electric Co., 569 F. Supp. 1057, 1118 and 1131 (D.D.C. 1983).

⁷ In fact, the MFJ court recognized that it is the Commission that has authority over numbering issues, stating: "When the FCC orders a revision in [the national area numbering plan] - which it apparently has the authority to do at any time - the dialing parity which is in keeping with the equality principles of the proposed decree will in fact be achieved." United States v. American Tel. and Tel. Co., 552 F.Supp 131 (D.D.C. 1982) at p. 197. See, also, Id. at note 279, p. 198. Bellcore also recognizes that the Commission retains plenary jurisdiction over numbering. See, Bellcore at p. 3.

⁸ See, e.g., In the Matter of the Need to Promote Competition and Efficient Use of Spectrum for Radio Common Carrier Services, 2 FCC Rcd. 2910, 2912 (1987).

⁹ In its recent NANP Proposal - The Future of Numbering in World Zone 1, distributed to Industry Carriers Compatibility Forum (ICCF) Participants January 6, 1992 (Long-Term Numbering Plan), Bellcore describes this process: "In Canada, when numbering-related public policy requires clarification, the government (Department of Communications (DOC)) is consulted. The Canadian Radio-television and Telecommunications Commission (CRTC) has jurisdiction over the use of (continued on following page)

likely to be accommodated if the Commission decides numbering issues.¹⁰ Commission regulation of numbering is less likely to be "partial" than would solutions designed by Bellcore, which is owned by the RBOCs. For these reasons, any arguments questioning the Commission's responsibility to decide numbering issues should be ignored.

II. THE COMMENTS ON NARUC'S PETITION AND CONFUSION WITHIN THE INDUSTRY CLEARLY DEMONSTRATE THE NEED FOR COMMISSION ACTION TO DETERMINE POLICY ISSUES ON NUMBERING

The comments to NARUC's Petition illustrate that direction from the Commission for numbering policy and administration may not have been critical in the past, but changes in the telecommunications environment have made Commission involvement essential. The processes that may have been sufficient previously appear now to be opening the door to inappropriate policymaking and misguided or biased administration on the part of the NANPA.¹¹ The most striking disagreement among the parties

(footnote 9, continued) numbering resources by Canadian telecommunications carriers under its jurisdiction. Within the Caribbean basin, no central authority exists with jurisdiction over the NANP. The governments of each of the Caribbean administrations within the NANP participate in the discussion of numbering issues involving their respective countries on an 'as needed basis' and voluntarily acknowledge the NANPA as "ombudsman" for their numbering needs."

¹⁰ Telecom Canada indicated in its comments that although it has been satisfied with Bellcore's administration, it would welcome the opportunity to be involved in any Commission inquiry. Unitel and Cantel also asked that they be allowed to contribute. MCI believes that comments from these entities, from the governing agencies in Canadian and other NANP nations as well as countries outside of World Zone 1 should be welcome in devising solutions to numbering issues.

¹¹ Only Bellcore, many of the current owners of Bellcore (i.e. the RBOCs), GTE and USTA deny the need for a broad inquiry, suggesting that most or all of the issues are simply better handled by Bellcore and the industry consensus process. (See, Ameritech at 1, Bellcore at 8, NYNEX at 2-3, Pacific at 1, Southwestern Bell at 1, USTA at 3 and US West at 2. Only one of the RBOCs, specifically BellSouth, supports an inquiry, and Bell Atlantic did not file comments. GTE supports an inquiry into roughly half of the issues raised by NARUC. GTE at 1,7.) All of the other parties support NARUC's Petition on a number of issues. See, Rochester at 2-3 and footnote 12, below. However, Bellcore's comments betray its partiality. For example, Bellcore asserts that: "NARUC has presented no basis for instituting an inquiry to address speculative (and baseless) concerns that NANPA may not be adequately seeking to minimize costs and conserve numbering resources, that it may be conferring competitive (continued on following page)

commenting on NARUC's petition regards the potential of Bellcore and the NANPA, using current processes, to unfairly determine current or future numbering issues.¹² The industry simply cannot accept the NANPA as an unbiased entity to decide these questions; Commission action is urgently required.

Even as the Commission is deciding whether to initiate a NOI, policy decisions that affect all segments of the industry are continuously being made outside the regulatory process.¹³ For example, the NANPA recently distributed its Long-Term Numbering Plan regarding the implementation of interchangeable numbering plan area codes (INPAs), and

(footnote 11, continued) advantages on its owners, or that it may not be considering the needs of all sectors of telecommunications." Bellcore at 8. Bellcore's biased assumption that one of the NANPA's goals is to minimize costs and to conserve numbering resources is disconcerting. Bellcore appears to be setting the policy objectives for numbering that are favorable to the RBOCs. Instead, the Commission should be setting policy objectives that balance the interests of ratepayers' need for reasonably priced universal service with the concerns for encouraging the development of new products and maintaining global competitiveness. Infrastructure upgrades are often costly, but they also encourage innovation and efficiency. The proper balance of these issues is an appropriate subject for determination by the Commission, not by Bellcore.

¹² Some parties, notably Bellcore, several RBOCs, and USTA claim that Bellcore and the NANPA have always behaved in a public, fair and responsible manner, and that current processes will continue to serve the industry well on future numbering issues. See, Ameritech at 18-19, Bellcore at 8, NYNEX at 8-9, Pacific at 7-8, USTA at 2-4, US West at 2-4.

No party has disputed the technical expertise of Bellcore and the NANPA. However, other members of the industry, including cellular carriers, alternative access vendors (AAVs), local exchange carriers (LECs), interexchange carriers (IXCs) and public service commissions are clearly concerned about several aspects of the current process and/or administrator to accommodate current or future industry numbering needs. These entities support an inquiry into policies and procedures that must be followed by the NANPA, (See, AT&T at 3, GTE at 8, NYNEX at 9.) processes to assure that administration is accomplished in a fair or nondiscriminatory manner, (See, AT&T at 3, Centel at 3, D.C. PSC at 2-3, McCaw at 2-14, MFS at 3, NTCA at 1, Rochester at 3.) the appropriate entity to administer numbering codes and provide guidance or decisions on numbering issues (See, Allnet at 1-2, BellSouth at 8, Cantel at 1, FPSC at 2, GTE at 8-9, McCaw at 13-14, Teleport at 1-2.) and appropriate methods of resolving disputes between industry participants and between the administrator and industry participants. (See, AT&T at 3, McCaw at 14.) Many also present examples of Bellcore, the NANPA and the RBOCs using ad hoc or unexplained methods for allocating numbering resources, and actual or potential abuses of power in favor the RBOCs. (See, Allnet at 1-2, McCaw at 4-12, MCI at 5-7, Telocator at sections I and II.)

¹³ Bellcore asserts generally that complaints are an adequate remedy, and that it is significant that the Commission has not had to resolve such complaints. Bellcore at 3. However, absent clear policy direction the enforcement process simply cannot work effectively.

plans for the NANP through 2025.¹⁴ The NANPA admits that there must be policy decisions against which a proposed plan should be judged:

In order to determine the credibility of a proposed plan, there should be: 1.) a set of attributes against which the plan can be compared both during its development and upon completion; 2.) a list of global assumptions to establish the environment for the development of the plan proposal; and 3.) a set of guiding principles for the assignment and use of NANP resources under the plan.¹⁵

However, Bellcore clearly intends to decide these critical policy issues utilizing the old processes that are currently under dispute.¹⁶ Additionally, the NANPA has again demonstrated its bias in the projected number policies contained in its Long-term Numbering Plan. For example, the NANPA has refused to allocate any interchangeable NPAs for clearly identified current needs for IXC network identification.¹⁷ Yet, it has assigned 80 interchangeable NPAs for personal communications services (PCN) that are not projected to be available for many years.¹⁸ Further bias is evidenced by its recommendation for elimination of the 950 dialing plan, which is clearly utilized today for

¹⁴ NANP Proposal - The Future of Numbering in World Zone 1, distributed to Industry Carriers Compatibility Forum (ICCF) Participants January 6, 1992 (Long-Term Numbering Plan).

¹⁵ Id., at at 1, Section 1.

¹⁶ Bellcore has asked industry input on the plan, but it has also stated its intent to incorporate only "those [comments] deemed appropriate" into the revised proposal. Although it also states it plans to forward any numbering issues for which it cannot obtain consensus to the Commission and Canadian government agencies, this provides little comfort to the industry members who have not been satisfied with the consensus process. MCI is gravely concerned about the issues raised in these Reply Comments regarding the Long-term Numbering Plan, but does not view them as a comprehensive list of its concerns. MCI is still reviewing the plan for further comments.

¹⁷ Long-Term Numbering Plan at 11, Section 3.4.2.

¹⁸ Id. at 13, Section 4.2.

services offered by IXCs.¹⁹ The Commission should not simply accept these results without an inquiry, given the conflict between RBOC and Bellcore assertions of the stellar performance of current processes, and the specific evidence from other segments of the industry of NANPA abuses, plus the concerns regarding its ability to fairly and efficiently handle future issues.

Another confusing situation has arisen which could probably have been avoided by a viable response from the NANPA to valid international IXC requests for international inbound network identification. MCI is referring to the use of the 400 SAC code for AT&T international inbound service to the United States from Spain by AT&T through an agreement with the Spanish authorities. Absent the allocation of a specific international inbound network identifier, AT&T had to initiate a country-specific solution to accomplish the same result. Basically, it simply adopted, without NANPA or Commission approval, for use in Spain alone, the 400 code which is designated as a SAC code for future domestic services by the NANPA. AT&T converts the 400 code to a domestic NPA for termination in the United States. Other carriers, in an effort to compete with AT&T's service, are likely to adopt other codes for country-specific use. This process has serious implications for the introduction of future services and will create inconvenient and confusing dialing for international inbound calls.²⁰ Thus, the Commission needs to become involved in setting

¹⁹ Id. at 17.

²⁰ Given the limited number of NPAs still available, the 400 SAC or other SAC codes could be reclaimed for use as a geographic NPA, and a direct conflict in dialing would arise between the AT&T service and other inbound international calls destined for the new NPA. Aside from the potential conflict with a domestic NPA, country-specific arrangements will intensify confusion in dialing, in contravention of the public-interest, when different SAC codes are used for different countries by different carriers for different services. An extremely complex international dialing plan could result.

policy to fairly and efficiently assign codes for international inbound termination. Otherwise, the problem is likely to escalate, resulting in confusion and chaos for international calling.

These numbering concerns are not technicalities; they represent broad issues of policy that must be decided in an unbiased, regulatory arena. Clearly, many industry members, including MCI, believe decisions that should be the purview of regulators are currently being handled unfairly, in an ad hoc manner, or not at all by current processes, and future needs will put additional strains on these processes. MCI thus again recommends that the Commission establish a NOI immediately as defined in MCI's Comments to this proceeding, emphasizing commentary on ways to ensure the fair administration of numbering resources and equitable future policies for numbering plans.

III. THE NOI MUST BE STRUCTURED TO AVOID DELAY IN IMPORTANT SOLUTIONS, RECONSIDERATION OF ISSUES ALREADY DECIDED IN OTHER PROCEEDINGS AND ENFORCEMENT OF UNAPPROVED POLICIES

MCI agrees that a protracted NOI process could delay important solutions that have already been decided upon, jeopardizing the availability of important numbering resources.²¹ Thus, MCI concurs that the Commission should encourage the expansion of CIC codes and INPA implementation as soon as possible. As MCI demonstrated in its Comments, Bellcore and the RBOCs have stalled these solutions already to the point where universal service is threatened. Additionally, the Commission should not use its resources to enforce LEC-favorable NANP reclamation and conservation procedures.²² These

²¹ See, e.g., GTE at 1, Pacific at 3-5.

²² See, e.g., Ameritech at 15-16.

procedures are not approved policies; they have not been scrutinized by the Commission or subjected to formal industry comment.

Nor should the Commission adopt the ludicrous suggestion that the NOI be used to reconsider the Commission's correct decision that for purposes of determining rates under price caps that number expansion be treated as an endogenous cost, similarly to equal access costs.²³ Petitions for reconsideration at this late date are explicitly prohibited.²⁴ In any case, such code expansion is clearly a normal, ongoing part of LEC activities.²⁵ To treat such ordinary expansion costs as exogenous would clearly subvert the Commission's price cap goals of providing incentives to carriers to become more productive and efficient.²⁶

²³ Discussion of determining cost recovery under price caps is specifically raised by Ameritech at 11-13 and Pacific Bell at 9. Other carriers ask that the Commission consider cost issues generally. See, e.g., Southwestern Bell at 3, GTE at 10 and USTA at 4. For a discussion of the Commission's decision, see, In the Matter of Policy and Rules Concerning Rates for Dominant Carriers, CC Docket 87-313, Second Report and Order adopted September 19, 1991. (Price Cap Order), Paragraph 180, and Order on Reconsideration, adopted April 9, 1991 (Price Cap Reconsideration Order) Paragraph 64-66.

²⁴ 47 C.F.R. Section 1.106(f).

²⁵ As Ameritech states. "INPA is the next step in the evolution of the long term overall plan initiated in 1947, to continuously evolve the NANPA to meet demand for additional numbers, while retaining the familiar ten-digit code and number structure."

²⁶ Price Cap Order, at Paragraph 1. To maintain the proper incentives, the Commission even excluded from exogenous treatment "extraordinary costs' that result from . . . cost changes mandated by this Commission." Id., Paragraph 189.

IV. CONCLUSION

MCI respectfully requests that the Commission, in furtherance of the public interest, grant NARUC's Petition as discussed herein and immediately initiate a NOI to address how best to fairly and equitably satisfy all ratepayer and industry needs in the administration of NANP resources.

Respectfully submitted.

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January 17, 1992

CERTIFICATE OF SERVICE

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